

**Remarks**

Reconsideration of the above-captioned patent application is respectfully requested in view of the following remarks.

Claims 2, 4, 5, 7 and 9-13 currently are pending in the above-captioned patent application, and are subject to examination.

In the Office Action mailed April 6, 2004, the Examiner rejected claims 2, 4, 5, 7, and 9-13 under 35 U.S.C. § 103(a), as allegedly being rendered obvious by U.S. Patent No. 6,441,819 to Suzuoki in view of U.S. Patent No. 5,434,591 to Goto *et al.* ("Goto"). Specifically, the Examiner asserts that Suzuoki discloses or suggest most of the limitations of independent claims 12 and 13. However, the Examiner acknowledges that Suzuoki fails to disclose or suggest an image displaying system in which during scrolling, the image only is represented by the data group indicating the indispensable points. See, e.g., Office Action, Page 4, Lines 1-4. Nevertheless, the Examiner asserts that Goto supplies these missing elements, and that it would have been obvious to those of ordinary skill in the art at the time the invention was made to modify the image displaying system described in Suzuoki, such that during scrolling, the image only is represented by the data group indicating the indispensable points. See, e.g., *Id.* at Lines 4-12.

In order for the Examiner to establish a prima facie case for obviousness, three (3) criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to those of ordinary skill in the art, to modify the primary reference as the Examiner proposes.

Second, there must be a reasonable expectation of success in connection with the Examiner's proposed combination of the references. And third, the prior art references must disclose or suggest all of the claim limitations. MPEP 2143 (emphasis added.) Applicant maintains that the Examiner fails to establish a prima facie case for obviousness because the Examiner fails to establish that Goto discloses or suggests an image displaying system in which during scrolling, the image only is represented by the data group indicating the indispensable points. Moreover, the Examiner acknowledges that Suzuoki does not disclose or suggest these limitations.

Independent claim 12 describes a method of displaying an image comprising the steps of "classifying vector data, indicating a plurality of points for displaying the image, into a group of data indicating indispensable points required for recognizing the image, and a group of data indicating supplementary points for supplementing the indispensable points to display a more precise image, . . . wherein the image is represented only by the data group indicating the indispensable points when being scrolled on a screen." (Emphasis added.) Similarly, independent claim 13 describes a system for displaying an image comprising "a data storage member for classifying vector data, indicating a plurality of points for representing the image, into a data group indicating indispensable points required for a minimum recognition of the image, and a data group indicating supplementary points for supplementing the indispensable points to represent the more precise image, and for storing the vector data, . . . wherein said image quality selection member selects the image display represented only by the data group indicating the indispensable points when the image

is scrolled on a screen." (Emphasis added.) Applicant's specification states that the "indispensable points" correspond to points which are "required for a minimum recognition of the [image]." See, e.g., Appl'n, Page 14, Line 10. Thus, in Applicant's claimed invention, during scrolling of an image through a screen, only those points which are required for minimal recognition of the image are used to represent the image.

In contrast, Goto describes a system for displaying graphic data in which "a characteristic of the data is altered, according to the speed of the scrolling, to facilitate the viewing of the data as the data is scrolled". Goto, Abstract, Lines 2-4. Specifically, "a selected part of the data is omitted from the display during scrolling so that a reduced amount of data is displayed, the amount of reduction in displayed data being proportional to the scrolling period." *Id.* at Lines 5-8 (emphasis added.) Because the amount of graphic data displayed changes during scrolling based on the scrolling period, the image displaying system described in Goto does not display only those points which are required for minimal recognition of the image. In contrast, in Applicant's claimed invention, during scrolling, the number of points used to represent the image remains constant, i.e., only the "indispensable points" are used to represent the image throughout the scrolling process. Therefore, Applicant respectfully requests that the Examiner withdraw the obviousness rejection of independent claims 12 and 13.

Claims 2, 4, 5, 7, and 9-11 depend from allowable independent claims 12 and 13, respectively. Therefore, Applicant respectfully requests that the Examiner also withdraw the obviousness of claims 2, 4, 5, 7 and 9-11.

**CONCLUSION**

Applicant respectfully submits that the above-captioned patent application is in condition for allowance, and such action is earnestly requested. If the Examiner believes that an in-person or telephonic interview with Applicant's representatives would expedite the prosecution of the above-captioned patent application, the Examiner is invited to contact the undersigned attorney of records. Applicant believes that no fees are due as a result of this response to the outstanding Office Action in the above-captioned patent application. Nevertheless, in the event of any variance between the fees determined by Applicant and those determined by the U.S. Patent and Trademark Office, please charge any such variance to the undersigned's Deposit Account No. 01-2300.

Respectfully submitted,



Timothy J. Churna  
Attorney for Applicant  
Registration No. 48,340

Customer No. **004372**  
ARENT FOX, PLLC  
1050 Connecticut Avenue, N.W., Suite 400  
Washington, D.C. 20036-5339  
Tel: (202) 857-6000  
Fax: (202) 638-4810  
TJC/klf